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15	Attorneys for Defendant VASILE MEREACRE		
16	I MITTED STATES	DISTRICT COLIDT	
17	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN JOSE DIVISION		
18			
19	UNITED STATES OF AMERICA,	Case No. CR 18-348 LHK (NC)	
20	Plaintiff,		
21	v.	STIPULATION AND [FROPOSED] ORDER TO MODIFY	
22	VASILE MEREACRE,	CONDITIONS OF PRETRIAL RELEASE	
23	Defendant.		
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27			
28	Page - 1 - of 4 Stipulation and [Proposed] Order Modifying Terms of Pretrial Release		

IT IS HEREBY STIPULATED by the parties through their counsel that defendant VASILE MEREACRE may reside and be supervised in the Southern District of Florida in lieu of the Middle District of Florida.

By way of background, and in support of this stipulation, Defendant states the following:

- 1. Defendant is charged by Indictment with Conspiracy to Violate 18 U.S.C. §§ 1030(a)(7)(B) and (c)(3)(A) and Extortion Involving Computers in violation of 18 U.S.C. §§ 1030(a)(7)(B) and (c)(3)(A) in this District under Case No.: CR-18-00348-LHK.
- 2. On October 16, 2018, Defendant was taken into federal custody in the Southern District of Florida based on the arrest warrant in the above captioned case.
- 3. On October 22, 2018, Magistrate Judge Patrick A. White (Southern District of Florida) released Defendant on bond with the following conditions of pre-trial release pursuant to a stipulation between the United States and Defendant:
  - a. \$250,000.00 Personal Surety Bond co-signed by Defendant's parents, Nicolae and Liuba Mereacre:
  - b. \$100,000.00 Corporate Surety Bond secured by Defendant's parents property located in Palm Coast, Florida;
  - c. Defendant to reside at 109 Laguna Forest Trail, Palm Coast, Florida32164 (Middle District of Florida) during the pendency of the case;
    - d. Home Confinement monitoring;
  - e. Defendant shall post a \$25,000.00 cashier's check payable to the Clerk of U.S. District Court for the Middle District of Florida within 48 hours of his release from custody;
  - f. Report to Pre-Trial Services as directed in the Middle District of Florida with the following special conditions:
    - i. Surrender all passports and travel documents;
    - ii. No computer access except for communicating with his counsel;

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Stipulation and [Proposed] Order Modifying Terms of Pretrial Release

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- iii. Defendant shall report weekly in person or by telephone to his counsel.
- g. Defendant shall appear before the Honorable Susan van Keulen, United States Magistrate Judge in the Northern District of California on November 8, 2018 at 1:30 p.m. at 280 South First Street, San Jose, California 95113.
- 4. On October 24, 2018, Defendant filed an Unopposed Motion to Modify Conditions of Pretrial Release (see FLSD 1:18-MJ-03533 AOR, ECF Doc 11) requesting the modifications noted below. On October 25, 2018, the Honorable Patrick A. White denied that motion without prejudice, noting that the "motion may be re-filed in the Northern District of California, where jurisdiction in this case lies." (See FLSD 1:18-MJ-03533 AOR, ECF Doc 12).
- 5. Defendant therefore requests this Court to modify his pre-trial release conditions as follows:
  - a. Allow Defendant to reside and be supervised in the Southern District of Florida as follows: Defendant is allowed to reside at 316 NW 36th Street, Oakland Park, Florida 33309 until October 10/30/2018; thereafter, he may reside at 180 Northeast 29th Street, Unit 304, Miami, Florida, 33137 (both residences which are in the Southern District of Florida). He shall report to Pretrial Services in the Southern District of Florida.
  - b. Impose a curfew to Defendant's home confinement between the hours of 10:00 p.m. and 6:00 a.m.
  - c. Allow Defendant to make cashier's check payable to the United States

    District Court for the Southern District of Florida in lieu of the Middle District of

    Florida.
- 6. Undersigned counsel have conferred with AUSA Susan Knight who agrees to the requests set forth in this stipulation.

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1	SO STIPULATED:	
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3	Dated: October 25, 2018	/s/ Christopher G. Lyons
4		Ronald Gainor Adam Pennella
5		Counsel for Vasile Mereacre
6		
7	Dated: October 25, 2018	ALEX G. TSE Acting UNITED STATES ATTORNEY
8		
9		Susan Knight
10		Assistant United States Attorney
11		
12		
13	SO ORDERED:	
14	Dated: October 26, 2018	Urginia & O. March
15	Dated: October 26, 2018	Honorable Nathanial Cousins
16		United States Magistrate Judge Virginia K. DeMarchi
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